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11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**
13

14 *In re: Hyundai and Kia Engine*
15 *Litigation*

CASE NO. 8:17-cv-00838

Member Cases: 8:17-cv-01365-JLS-JDE
8:17-cv-02208-JLS-JDE 2:18-cv-05255-
JLS-JDE 8:18-cv-00622-JLS-JDE

Related Case: 8:18-cv-02223-JLS-JDE

**DECLARATION OF TIONNA
DOLIN REQUESTING
CONFIRMATION OF TWELVE
CONSUMER'S REQUESTS FOR
EXCLUSION**

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27 ¹ Strategic Legal Practices, APC represents the following California consumers for the limited
28 purpose of confirming their request for exclusion from the class settlement in the instant action

DECLARATION OF TIONNA DOLIN

I, TIONNA DOLIN, declare as follows:

1. I am an attorney at law duly licensed to practice before the courts of the State of California and United States District Court in the Central District of California. I am an attorney at the law firm of Strategic Legal Practices, counsel for the following Plaintiffs for the limited purpose of confirming each of the plaintiffs' requests for exclusion from the class action settlement in the instant action because each of the following Plaintiff's submitted a timely and valid opt-out but their names does not appear on the opt-out list that was filed with this Court on November 12, 2020. Dkt. No. 176.

a) Albert Addis;

b) Maria Leticia Guerrero;

c) Alvaro Cruz;

d) Daniel Garcia (Co-Plaintiff Damas Garcia *does* appear on Defendants' Exclusion List);

e) Nishi Moonka (Co-Plaintiff Kris Orpilla *does* appear on Defendants' Exclusion List);

f) Rachel D. Naber formerly known as Rachel D. Wright;

g) Sherry Layton (Co-Plaintiff Steven Horn *does* appear on Defendants' Exclusion List).

h) Carolina Palma (Co-Plaintiff Auxiliadora Palma *does* appear on Defendants' Exclusion List);

i) Theodora Parnavelas (Co-Plaintiff Athan Parnavelas *does* appear on Defendants' Exclusion List);

j) Laura Cutkomp;

k) Jennifer Cutkomp; and

l) Luz Delia Cruz;

2. I make this declaration based on my personal knowledge.

1 3. I am informed and believe that the above listed individuals timely
2 submitted a timely and valid request for exclusion from the class action settlement
3 in the instant action.

4 4. None of the above listed individuals' names were included in the list
5 of consumers whom requested exclusion identified in Exhibit A to Defendants'
6 Supplemental Notice Regarding Settlement Exclusions filed on November 12,
7 2020. Dkt. No. 176.

8 5. As counsel for the above listed individuals, I respectfully request the
9 Court confirm each of the timely requests for exclusion and amend the Final Order
10 and Judgment to include each of the above listed consumers' names.

11 6. Attached as **Exhibit 1** is a true and correct copy of the request for
12 exclusion letter and copy of timely postmarked proof of mailing sent on behalf of
13 Albert Addis.

14 7. Attached as **Exhibit 2** is a true and correct copy of the request for
15 exclusion letter and copy of timely postmarked proof of mailing sent on behalf of
16 Maria Leticia Guerrero.

17 8. Attached as **Exhibit 3** is a true and correct copy of the request for
18 exclusion letter and copy of timely postmarked proof of mailing sent on behalf of
19 Alvaro Calderon.

20 9. Attached as **Exhibit 4** is a true and correct copy of the request for
21 exclusion letter and copy of timely postmarked proof of mailing sent on behalf of
22 Daniel Garcia.

23 10. Attached as **Exhibit 5** is a true and correct copy of the request for
24 exclusion letter and copy of timely postmarked proof of mailing sent on behalf of
25 Nishi Moonka.

26 11. Attached as **Exhibit 6** is a true and correct copy of the request for
27 exclusion letter and copy of timely postmarked proof of mailing sent on behalf of
28 Rachel D. Naber formerly known as Rachel D. Wright.

1 12. Attached as **Exhibit 7** is a true and correct copy of the request for
2 exclusion letter and copy of timely postmarked proof of mailing sent on behalf of
3 Sherry Layton.

4 13. Attached as **Exhibit 8** is a true and correct copy of the request for
5 exclusion letter and copy of timely postmarked proof of mailing sent on behalf of
6 Carolina Palma.

7 14. Attached as **Exhibit 9** is a true and correct copy of the request for
8 exclusion letter and copy of timely postmarked proof of mailing sent on behalf of
9 Theodora Parnavelas.

10 15. Attached as **Exhibit 10** is a true and correct copy of the request for
11 exclusion letter and copy of timely postmarked proof of mailing sent on behalf of
12 Laura Cutkomp.

13 16. Attached as **Exhibit 11** is a true and correct copy of the request for
14 exclusion letter and copy of timely postmarked proof of mailing sent on behalf of
15 Jennifer Cutcomp.

16 17. Attached as **Exhibit 12** is a true and correct copy of the request for
17 exclusion letter and copy of timely postmarked proof of mailing sent on behalf of
18 Luz Delia Cruz.

19 18. Defendant's Settlement Exclusion List was filed on November 12,
20 2020. As a result, I was unable to check the list and file this declaration until today.
21 I apologize to the Court for any inconvenience the timing of this filing may cause.

22 19. I declare under penalty of perjury under the laws of the State of
23 California that the foregoing is true and correct.

24
25 DATED: November 13, 2020

/s/ Tionna Dolin

TIONNA DOLIN